



A07-0013 7/19/01

National Environmental Achievement Track

Application Form

Spicer Manufacturing, Inc.

Name of facility

Dana Corporation

Name of parent company (if any)

2075 Corporate Circle

Street address

Cape Girardeau, MO 63703

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Michael Decker

Title Environmental Engineer

Phone 573-339-8416

Fax 573-339-8486

E-mail michael.decker@dana.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Our facility machines steel, aluminum, and cast iron components for light vehicle axles.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3714

NAICS
336350

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

MOD985773100

Section A, continued

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

See the enclosed completed Environmental Requirements Checklist.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Our facility was certified to the ISO 14001 standard by Underwriter's Laboratories on June 8, 2000.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

Section C

Tell us about your past achievements and future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Reduction in the amount of Filter Press Cake generated during the wastewater pretreatment process.	202,500	Pounds	90,000	Pounds
<p>i. How is the current level an improvement over the previous level?</p> <p>During 1998, we generated 202,500 pounds of filter press cake. In 2000, we generated 90,000 pounds of filter press cake. This represents a reduction of 112,500 pounds.</p> <p>ii. How did you achieve this improvement?</p> <p>This reduction is attributed to modification in the wastewater pretreatment process.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?	What is the current level?
	Quantity	Quantity
	Units	Units
	Pounds	Pounds
Recycling of industrial gloves	53,881	13,910
<p>i. How is the current level an improvement over the previous level?</p> <p>The 1998 number of purchased pairs of gloves was 107,762. In 2000, we purchased 27,821 pairs of gloves. Which represents a reduction of 79,941 pairs of gloves purchased.</p> <p>Note: The average weight of our industrial gloves is 0.5 pounds per pair.</p> <p>Additional benefits include the following:</p> <p style="margin-left: 40px;">Waste Disposal of "dirty gloves"</p> <p style="margin-left: 40px;">1998 - 32,032 pounds</p> <p style="margin-left: 40px;">2000 - 0 pounds</p> <p style="margin-left: 40px;">Number of Pairs Cleaned</p> <p style="margin-left: 40px;">1998 - 7,573 pounds</p> <p style="margin-left: 40px;">2000 - 27,490 pounds</p>		
<p>ii. How did you achieve this improvement?</p> <p>The "dirty" gloves are cleaned using a laundering process. Once the gloves are cleaned and sorted they can be re-issued. Depending on the type of glove, they are able to be reused 2-4 times.</p>		

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Reduce the annual volume of industrial wastewater discharged to the POTW.

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

Current Level:

2.56 million gallons/year
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

Target Level:

2.3 million gallons/year
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

The reduction of the amount of industrial wastewater discharged to the POTW will be accomplished through manufacturing process improvements and reuse of the cleaned water. Some examples of reuse could include make-up water for coolant and washers.

Second aspect you've selected

a. What is the aspect?

Reduce the amount of Sulfuric Acid used in the industrial wastewater pre-treatment process.

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

Current Level:

14,820 pounds/year
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

Target Level:

12,968 pounds/year
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

The reduction in the amount of Sulfuric Acid shall be accomplished with refinements to the wastewater pretreatment process.

Third aspect you've selected

- a. What is the aspect? Reduce the amount of Total Fats, Oils, and Greases (FOG) in the industrial wastewater discharged to the POTW.
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value Current Level:
1,012 pounds/year
(Based on 2.56 million gallon/year @ 47.4 mg/l)
(Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value Target Level:
738 pounds/year
(Based on 2.3 million gallons/year @ 38.47 mg/l)
(Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? The reduction of Total Fats, Oils, and Greases (FOG) in the effluent discharged to the POTW shall be accomplished with refinements to the wastewater pretreatment process.

Fourth aspect you've selected

a. What is the aspect?

Reduce the total annual purchased amount of machine lubricants and metalworking fluids per piece manufactured.

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

Current Level:
120,011 gallons
purchased/year
(Based on 2.69 million
pieces produced)(Equal to
0.0447 gallons per
component produced)
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

Target Level:
108,009 gallons
purchased/year
(Based on 2.69 million
pieces produced)(Equal to
0.0401 gallons per
component produced)
(Quantity/Units)

e. How will you achieve this improvement?

The reduction of the total annual purchased amount of machine lubricants and metalworking fluids shall be accomplished by:

- 1) improving the manufacturing processes,
- 2) identification and repair of leaking equipment,
- 3) reduction in the amount of fluid carried off on the metal chips,
- 4) improvement of the coolant recycling system.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Concerns and questions regarding the environmental aspects of Dana-Cape Girardeau's operations by external interested parties can be received through by several means including telephone, e-mail, mail, etc. These concerns and/or questions received at the Dana-Cape Girardeau facility shall be directed to the Plant Manager.

The Plant Manager will then evaluate each concern or question on an individual basis to determine the appropriate response.

2 How do you inform community members of important matters that affect them?

Should this arise, the local newspaper would be used to inform the community members of matters that affect them.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website [www.](#)

☒ Newspaper

☐ Open Houses

☒ Other

The availability of the Achievement Track Annual Report shall be announced in the local newspaper. The announcement will include contact information for requesting a copy of the report.

Section D, continued

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

- 5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Cape Girardeau Chamber of Commerce	John Mehner	573-335-3312
<i>State/Local Regulator</i>	City of Cape Girardeau	Ken Leimer	573-334-5150
<i>Other community/local reference</i>	Southeast Missouri LEPC	David Hitt	573-204-0911

Section E

Application and Participation Statement.

On behalf of Spicer Manufacturing-Cape Girardeau,

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Larry Dillon, Plant Manager

Facility Name Spicer Manufacturing, Inc.

Facility Street Address 2075 Corporate Circle
Cape Girardeau, MO 63703

Facility ID Numbers MOD 985773100

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Spicer Manufacturing, Inc.
Facility Location: Cape Girardeau, Missouri
Facility ID Number(s): MOD985773100
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) ☐
2. Permits and Registration of Air Pollution Sources ☒
3. General Emission Standards, Prohibitions and Restrictions ☒
4. Control of Incinerators ☐
5. Process Industry Emission Standards ☐
6. Control of Fuel Burning Equipment ☐
7. Control of VOCs ☐
8. Sampling, Testing and Reporting ☒
9. Visible Emissions Standards ☐
10. Control of Fugitive Dust ☐
11. Toxic Air Pollutants Control ☐
12. Vehicle Emissions Inspections and Testing ☐

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)

13. ☐
14. ☐

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste ☒
 - Listed Waste ☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting ☒
 - Pre-transport requirements ☒
 - Record keeping/reporting ☒
3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)

- Transfer facility requirements ☐
- Manifest system and record-keeping ☐
- Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. ☐
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. ☐
- 7. ☐

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐
- 4. Solid Waste Storage and Removal Requirements ☐
- 5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- 6. ☐

7. ☐

Water Pollution Control Requirements

- | | |
|---|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | <input checked="" type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116) | <input type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) | <input type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122) | <input checked="" type="checkbox"/> |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129) | <input type="checkbox"/> |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | <input checked="" type="checkbox"/> |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) | <input type="checkbox"/> |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) | <input type="checkbox"/> |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) | <input type="checkbox"/> |
| 10. Water Quality Standards | <input type="checkbox"/> |
| 11. Effluent Limitations for Direct Dischargers | <input type="checkbox"/> |
| 12. Permit Monitoring/Reporting Requirements | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input type="checkbox"/> |
| 14. Collection, Handling, Processing of Sewage Sludge | <input type="checkbox"/> |
| 15. Oil Discharge Containment, Control and Cleanup | <input type="checkbox"/> |
| 16. Standards Applicable to Indirect Discharges (Pretreatment) | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- | | |
|-----|--------------------------|
| 17. | <input type="checkbox"/> |
| 18. | <input type="checkbox"/> |

Drinking Water Regulations

- | | |
|--|--------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/> |
| 2. National Primary Drinking Water Standards (40 CFR 141) | <input type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | <input type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | <input type="checkbox"/> |
| 5. Underground Injection Control Requirements | <input type="checkbox"/> |
| 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

- | | |
|----|--------------------------|
| 7. | <input type="checkbox"/> |
| 8. | <input type="checkbox"/> |

Toxic Substances

- | | |
|--|--------------------------|
| 1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) | <input type="checkbox"/> |
| 2. Import and Export of Chemicals (40 CFR 707) | <input type="checkbox"/> |
| 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) | <input type="checkbox"/> |
| 4. Chemical Information Rules (40 CFR 712) | <input type="checkbox"/> |
| 5. Health and Safety Data Reporting (40 CFR 716) | <input type="checkbox"/> |
| 6. Pre-Manufacture Notifications (40 CFR 720) | <input type="checkbox"/> |
| 7. PCB Distribution Use, Storage and Disposal (40 CFR 761) | <input type="checkbox"/> |
| 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) | <input type="checkbox"/> |
| 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

- | | |
|-----|--------------------------|
| 10. | <input type="checkbox"/> |
| 11. | <input type="checkbox"/> |

Pesticide Regulations

- | | |
|--|--------------------------|
| 1. FIFRA Pesticide Use Classification (40 CFR 162) | <input type="checkbox"/> |
| 2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) | <input type="checkbox"/> |
| 3. Certification of Pesticide Applications (40 CFR 171) | <input type="checkbox"/> |
| 4. Pesticide Licensing Requirements | <input type="checkbox"/> |
| 5. Labeling of Pesticides | <input type="checkbox"/> |
| 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements | <input type="checkbox"/> |
| 7. Disposal of Pesticide Containers | <input type="checkbox"/> |
| 8. Restricted Use and Prohibited Pesticides | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

- | | |
|-----|--------------------------|
| 9. | <input type="checkbox"/> |
| 10. | <input type="checkbox"/> |

Environmental Clean-Up, Restoration, Corrective Action

- | | |
|--|--------------------------|
| 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) | <input type="checkbox"/> |
| | <input type="checkbox"/> |
| 2. RCRA Corrective Action (identify) | <input type="checkbox"/> |
| | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

- | | |
|----|--------------------------|
| 3. | <input type="checkbox"/> |
| 4. | <input type="checkbox"/> |

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
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Cambridge, MA 02140